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February 1, 2011

Marlene H. Dortch
Secretary
Federal Communications Commission
Room TW-A325
445 12th Street, SW
Washington, DC 20554

Re: *A National Broadband Plan for Our Future*, GN Docket No. 09-51; *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92; *Intercarrier Compensation for ISP-Bound Traffic*, CC Docket No. 99-68; *IP-Enabled Services*, WC Docket No. 04-36; *Connect America Fund*, WC Docket No. 10-90; *High-Cost Universal Service Support*, WC Docket No. 05-337; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135

Dear Ms. Dortch:

On January 31, 2011, Jennie Chandra and I, from Windstream Communications, Inc. (“Windstream”), met with Christine Kurth, Policy Director and Wireline Counsel for Commissioner Robert M. McDowell. Consistent with its filings in the above-referenced dockets, Windstream discussed the need for comprehensive, rational reform of the intercarrier compensation system and the universal service high-cost program.

Windstream warned that a significant reduction in intercarrier compensation payments and/or frozen ICLS funding could slow network deployment and could even result in the withdrawal of investment in existing facilities. Given this concern, Windstream – consistent with the January 18, 2011, letter from the CEOs of CenturyLink, Qwest, Frontier, and Windstream to FCC Chairman Julius Genachowski¹ – urged the Commission to act now to confirm that VoIP traffic terminating to the PSTN is subject to the same intercarrier compensation rules as other voice providers with whom they compete. Consistent with its reply

¹ Letter from Glen F. Post, III, Chief Executive Officer and President of CenturyLink, Inc., Maggie Wilderotter, Chairman and Chief Executive Officer of Frontier Communications, Ed Mueller, Chairman and Chief Executive Officer of Qwest Communications, and Jeff Gardner, President and Chief Executive Officer of Windstream, to Julius Genachowski, Chairman, Federal Communications Commission, GN Docket No. 09-51, WC Docket Nos. 07-135, 05-337, 04-36, CC Docket Nos. 01-92, 99-68 (January 18, 2011).

comments in the *Connect America Fund* proceeding,² Windstream also noted that it is essential that the company continue to receive frozen ICLS.

With regard to universal service reform, Windstream emphasized the importance of continued support for carriers of last resort that have aggressively deployed broadband service in high-cost areas and will require ongoing support to maintain existing facilities.³

Sincerely,

/s/

Malena F. Barzilai

cc: Christine Kurth

² Reply Comments of Windstream Communications, Inc., WC Docket Nos. 10-90 and 05-337, GN Docket No. 09-51, at 37-40 (August 11, 2010).

³ See Federal Communications Commission, Connecting America: The National Broadband Plan at 137 (rel. March 16, 2010) (“National Broadband Plan”) (recognizing that some current federal universal service funds indirectly support broadband).